Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE: Humboldt River Field Office, LLNVW01000

TRACKING NUMBER: **DOI-BLM-NV-W010-2014-0039-DNA**

CASEFILE/PROJECT NUMBER: Imlay – H93Q

PROPOSED ACTION TITLE/TYPE: Imlay (H93Q) Fire Emergency Stabilization and Rehabilitation Plan

LOCATION/LEGAL DESCRIPTION:

Ground Seeding
T. 32 N., R. 34 E., sec. 21, 22
Seedling Planting
T. 32 N., R. 34 E., sec. 21, 22
Invasives Mgmt.
T. 32 N., R. 34 E., sec. 21, 22
Temporary Fence
T. 32 N., R. 34 E., sec. 21, 22

APPLICANT (if any): Bureau of Land Management (BLM)

Background Information on Fire

The Imlay Fire was ignited by lightning on 7/31/2014 and contained on 7/31/2014. The Imlay Fire occurred on the north end of the Humboldt Mountain Range. The fire area burned previously in 2000 in the Prince Royal Fire. The entire fire area is classified as mule deer crucial winter habitat and year-round pronghorn habitat as defined by the Nevada Department of Wildlife. The area is also heavily utilized by assorted small mammals, migratory birds, and is near raptor nesting sites. The loss of shrub cover and nesting and foraging habitat has occurred as a result of the fire.

The fire area has known populations of non-native invasive annuals including cheatgrass (*Bromus tectorum*) and the Nevada state category B noxious weed, Medusahead rye (*Taeniatherum caput-medusae*). Lack of treatment could result in monocultures of cheatgrass and Medusahead due to the lack of competition from native species directly after a fire. Obscure scorpion flower (*Phacelia inconspicua*), a special status species, has been identified in the adjacent mountains and its habitat could be threatened due to increasing populations of non-native invasive annuals caused by the Imlay Fire.

The soils in the burned area are identified as moderately erosive to wind and water events. The characteristics of these soils will contribute to accelerated soil loss to loss of shrub and grass cover. The fire occurred within close proximity to the town of Imlay. There are public safety issues associated with wind-blown dust into the town and onto the adjacent interstate-80.

The BLM burned area includes two soil map units, containing three soil components each. All of the soil components within the map units are associated with the same rangeland ecological site. The dominant rangeland ecological site is R024XY002NV, a loamy site receiving 5-8" of precipitation annually. The vegetation community for the loamy 5-8" P.Z. rangeland ecological site, in reference condition, is typically dominated by shadscale (*Atriplex confertifolia*), bud sagebrush (*Picrothamnus desertorum*) and Indian ricegrass (*Achnatherum hymenoides*).

The fire burned a total of 136 acres, with 43 acres of BLM-administered public lands, and 93 acres of private land within in the Prince Royal Grazing Allotment. In the Prince Royal Grazing Allotment it is estimated that closure to livestock use of the lands affected by fire would not substantially reduce Animal Use Months (AUMs).

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

Ground Seeding

The BLM proposes to broadcast, broadcast and harrow, and/or drill seed a total of 43 acres of public land managed by BLM that was burned. Seeding would occur in the fall or winter with a preference for application in late fall or early winter. The project would be seeded with forage kochia (*Bassia prostrata*) and crested wheatgrass (Agropyron cristatum). Seeding would be coordinated with a chemical control for invasive annual plant species to improve seeding efficacy.

Objectives for ground seeding are as follows:

1. Obtain an average of 0.5 seeded plants per meter^2 by the end of the third year following fire containment, which occurred on 07/31/2014.
2. Obtain 50% or greater perennial cover of the low potential perennial plant cover for the appropriate ecological site by the end of the third year following fire containment.
3. The ground seeding would result in lower abundance (density and cover) of invasive annual plant species and a higher abundance of desirable perennial plant species than the unseeded control areas.
4. Seeded species would be well established and reproducing.

Seedling Planting

The BLM proposes to install sagebrush (*Artemisia tridentata ssp. wyomingensis*) plants, utilizing hand-planting strategy (hoe-dad or auger planting) intermittently across 43 acres

of public land managed by BLM burned by the Imlay Fire. Planting would aim to occur before March 1st and if the project is unable to occur before then the project lead would coordinate with Winnemucca BLM wildlife biologists to ensure the least disruption for the migratory birds breeding season. The project would be utilizing containerized or bare-root seedlings, and seedlings would be planted at an approximate spacing of 20'x20'.

Objectives for seedling planting are as follows:

1. Obtain a survival rate of planted seedlings exceeding 60% by the end of the fiscal year 2017.
2. The seedling planting would result in lower abundance (density and cover) of invasive annual plant species, and a higher abundance of desirable perennial plant species than the unseeded control areas.
3. Seedlings would be well established and reproducing.

Invasive Plants and Noxious Weeds Management

Invasive species within the fire-affected area would be managed to limit further infestation through active treatment of previously existing and newly established infestations of noxious weeds. Up to 43 acres of noxious weed infestations would be treated annually during 2015, 2016, and 2017.

Ground seeded areas would be treated with Plateau (Imazapic) herbicide to control annual invasive plants in year one. Plateau treatment of ground seeded areas would be coordinated to promote germination and seedling establishment of native or selected non-native perennials. Application of Plateau would occur in conjunction with drill seeding operations and act as seed bed prep for the seeding treatment. Plateau would be applied at a rate of 2-4 oz./acre.

Located infestations, if any, would be treated with BLM approved herbicides as appropriate, and in compliance with BLM operating procedures and label requirements for BLM approved herbicides. Localized treatments may include one or more of the following chemicals depending on species present in project location:

Imazapyr
Glyphosate
2,4-D
Picloram
Dicamba
Metsulphuron methyl
Clorsulphuron

Herbicides would be applied by truck or ATV; herbicide may also be applied with crews utilizing backpack pumps to spray noxious weeds or annual invasive species. All infestations and treatments would be tracked in District GIS layers/shapefiles.

Construction of Temporary Fence

The BLM proposes to construct approximately 1.5 miles of temporary fence to protect seeding investments and natural recovery of perennial plants which have survived the burn event. Temporary fence would also protect burned soils from disturbance from livestock hoof-traffic which exacerbates frost-heave and associated wind erosion in the first 2-3 years following wildfire events.

The fence would be constructed according to BLM temporary fence specifications and would consist of 3 wires (3-wire barbed with smooth bottom wire); T-posts would be spaced 20' apart and easy panels would be used for all corner and stress panels. Temporary fence would be removed after objectives are met.

Environmental Protection Measures
The applicable design measures for this proposal are listed below. The existing NEPA documents are listed under section C.

All treatments identified will be in accordance with Instruction Memorandum IM-NV-2014-022 Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat (July 2014), and WO-IM-2014-114 Sage Grouse Habitat and Wildland Fire Management (July 2014).

Ground Seeding

Drill Seeding Implementation
Drill seeding measures would adhere to the Normal Year Fire Rehabilitation Plan Environmental Assessment No.NV-020-04-21 (DR/FONSI 8/19/2004):

Drill seeding would be used on slopes of 0 to 25 percent. Drills would be run perpendicular to slopes to prevent the formation of rills and gullies. Drills would be run parallel to state and interstate highways to lessen the potential for wind erosion.

Monitoring

All treatments would be monitored for efficacy and efficiency using established protocols and design features that are outlined in the Normal Year Fire Rehabilitation Plan Environmental Assessment No.NV-020-04-21 (DR/FONSI 8/19/2004). All vegetation treatments would be monitored for effectiveness using point-intercept, gap intercept and frame density techniques modified from Monitoring Manual for Grasses, Shrublands, and Savanna Ecosystems (Herrick, et, al., 2005) techniques outlined in BLM Technical Reference 1734-4 (BLM 1996), to determine perennial cover, and density of seeded and non-seeded plant species during the three years following fire containment on these areas.

Seedling Planting

Wildlife and Migratory Birds

Applicable measure from the Holloway Fire ESR DNA DOI-BLM-NV-WO10-2013-0015-DNA (DR/FONSI 12/27/2012):

No hand planting activities will be conducted within 0.6 miles of Sage Grouse lek sites during the sage-grouse lekking and nesting seasons from March 1st through June 30th. Greater Sage-Grouse nest and brood surveys in areas proposed for hand planting will be conducted no more than 10 days and no less than 3 days prior to initiation of disturbance. If active nests and/or broods are located, rehabilitation activities will be delayed until the grouse have voluntarily left the area.

Invasive Plants and Noxious Weeds Management

Wildlife and Migratory Birds

Applicable measures from the Winnemucca Wildland Urban Interface (WUI) Fuels Treatment Project Environmental Assessment No.NV-WO10-2010-0011-EA (DR/FONSI 9/20/2010):

Application of herbicide would not occur within ¼ mile of any known sage grouse lek sites.

Applicable measures from the Holloway Fire ESR DNA DOI-BLM-NV-WO10-2013-0015-DNA (DR/FONSI 12/27/2012):

During the raptor breeding season, January 1 through August 31, control of noxious weeds would be implemented or delayed in accordance with spatial and temporal recommendations defined in the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances (USFWS 2002).

Control of noxious weeds would not be conducted within 0.6 miles of active Sage Grouse leks during lekking and nesting season from March 1st through June 30th. Greater Sage-Grouse nest and brood surveys in areas proposed for noxious weeds control efforts will be conducted no more than 10 days and no less than 3 days prior to initiation of disturbance. If active nests and/or broods are located, rehabilitation activities will be delayed until the grouse have voluntarily left the area.

Plateau herbicide application

Applicable measures from the Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012):

Plateau application rates (range of rates) and application would be subject to label restrictions and standard operating procedures (SOPs, See Appendix I in EA).

Herbicide applications not including Plateau

The use of all other herbicides listed would adhere to the environmental protection measures listed below from the Integrated Weed Management Environmental Assessment NV-020-02-19 (DR/FONSI 8/27/2002).

1. Standard safety procedures and standard operating procedures would be strictly followed.
2. Re-applications of the herbicide would not be less than the persistence factor identified for any product selected for use.
3. Ground applications of herbicides (including backpack and power sprayer) would be limited to spraying the target weeds and the surrounding ground for 10 feet. Backpack applications of liquids would occur only at low nozzle pressure and at ground level. Granular formulations would be applied by broadcast spreaders or by hand within 3.5' of the ground.
4. The BLM would notify the livestock grazing permittee(s) when herbicides are used on grazing allotments. Phenology of target species and multiple use objectives would also be considered.
5. No herbicide application would be conducted when rain (greater than 50% chance) is predicted within 24 hours of treatment. The BLM would use the Interagency Fire Dispatch Center for weather reports for rain predictions.
6. All herbicide spray solutions would be applied with a blue dye so that application sites are visible.

B. Land Use Plan (LUP) Conformance

LUP Name* Sonoma-Gerlach Management Framework Plan (MFP)
Date Approved: 1982

*List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)

The proposed action in conformance with the applicable LUP because it is specifically provided for the following LUP decisions:

The proposed treatments are in conformance with the Sonoma-Gerlach MFP, .45 Soil-Water-Air which states in part;

1. "Consider rehabilitating areas which have had protective vegetative cover destroyed by wildfire….." "Utilize seed and other watershed stabilization techniques as required."

2. "Increase existing forage by artificial methods wherever appropriate. Land treatment is defined as vegetation manipulation (i.e. plowing, burning, spraying and/or seeding)."

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objective, terms, and conditions):

Sonoma-Gerlach MFP (1982)

Although not specifically addressed, stabilization and rehabilitation treatments conform to wildlife and watershed objectives WL-1, which state in part; "Provide for improvement or maintenance of wildlife habitat in the planning area in order to assure that sufficient quantity, quality and diversity of habitat exists to accommodate the needs of all species of wildlife…"

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

- Holloway Fire Emergency Stabilization and Rehabilitation Plans Environment Assessment, DOI-BLM-OR-B060-2013-0003-EA (DR/FONSI 3/1/2013)
- Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012)
- Winnemucca Wildland Urban Interface Area Treatment Project Environmental Assessment, DOI-BLM-NV-WO10-0011-EA, (DR/FONSI 9/20/2010)
- Paradise Fuelbreak Maintenance Environmental Assessment No.: DOI-BLM-NV-WO10-2010-0009-EA (DR/FONSI 7/19/2010)
- Santa Rosa Fuelbreak Project Environmental Assessment No.: DOI-BLM-NV-WO10-2010-0003-EA (DR/FONSI 2/19/2010)
- Vegetation Treatment Using Herbicides on BLM Lands in Seventeen Western States Programmatic Final Environmental Impact Statement, 07/2007, (ROD 9/29/07)
- Normal Year Fire Rehabilitation Plan Environmental Assessment EA# NV-020-04-21, 06/2004, (DR/FONSI 8/19/04)
- Integrated Weed Management Environmental Assessment NV-020-02-19, 8/07/02, (DR/FONSI 8/27/02)
- Vegetation Treatment on BLM Lands in Thirteen Western States Environmental Impact Statement, 05/91, (ROD 8/91)

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- IM NV 2014-022 Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat (July 2014)
- WO IM 2014-114 Sage-Grouse Habitat and Wildland Fire Management (July 2014)
- Holloway Fire ESR Determination of NEPA Adequacy DOI-BLM-NV-WO10-2013-0015-DNA (DR 12/27/2012)
- USFWS Biological Opinion for the Normal Year Fire Rehabilitation Plan (August 2004)
- A Report on National Greater Sage-Grouse Conservation Measures. Produced by: Sage-grouse National Technical Team, 12/21/2011 (pp 27)

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?
Documentation of answer and explanation:
Yes, the Normal Fire Rehabilitation Plan EA-NV-020-04-21 (DR/FONSI 8/19/04), addresses the proposed treatments including drill seeding, broadcast seeding, and installation of temporary fencing. Control of noxious weeds is analyzed in the Normal Fire Rehabilitation Plan EA-NV-020-04-21 (DR/FONSI 8/19/04), Integrated Weed Management EA-NV-020-02-19 (DR/FONSI 8/27/02) and the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States EIS (ROD 9/29/07).

Seedling planting has been analyzed in the Holloway Fire Emergency Stabilization and Rehabilitation Plans Environmental Assessment DOI-BLM-OR-BO60-2013-0003-EA (DR/FONSI 3/1/2013). Although the site specific geographic location analyzed is different, the geographic conditions and resources are sufficiently similar to the existing referenced EA document. The EA analyzes hand planting on similar vegetation communities and soils. The hand planting of seedlings would not leave depressions or ruts, compact the soils, or trample or compress vegetation. The analysis shows no effect of concern in the same resources being evaluated under this proposal. There would be no new impacts that would need further analysis.

Imazapic is registered for use and analyzed at a national –level in the Vegetation Treatment Using Herbicides on BLM Lands in Seventeen Western States Programmatic Final Environmental Impact Statement, 07/2007, (ROD 9/29/07). This level of study provided a broad regional analysis of Imazapic herbicide use on public land managed by the BLM.

The use of Imazapic herbicide to reduce the amount of annual plant species on BLM-administered public lands is analyzed in site-specific projects in the following EA's: Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012), Santa Rosa Cooperative Fuels Treatment Project DOI-BLM-NV-WO10-2010-0003-EA (DR/FONSI 2/19/2010), the Paradise Fuelbreak Maintenance DOI-BLM-NV-WO10-2010-0009-EA (DR/FONSI 7/19/2010), and the Winnemucca Wildland Urban Interface Area Treatment Project DOI-BLM-NV-WO10-2010-0011-EA (DR/FONSI 9/20/2010). The Imlay Fire project location is sufficiently similar to the site specific geographic conditions and resources analyzed in the existing referenced NEPA documents. The existing EA documents analyze Imazapic herbicide application on similar projects and similar vegetation communities and soils. The analysis includes similar application as Imazapic would be applied by machine application on the ground and used to remove and control the growth of annual species such as cheatgrass, tumble mustard, and Russian thistle.

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Documentation of answer and explanation:
Yes, the range of alternatives analyzed in the existing NEPA documents are appropriate with respect to the current proposed action and current environmental concerns, interests, resource values and circumstances.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation:
Yes, the existing analysis is adequate and there is no new information or circumstances regarding the current proposal that would necessitate new analysis. In 2010, the USFWS found that listing of the Greater Sage Grouse under the Endangered Species Act was warranted, but precluded by higher priority listings actions. Since that time BLM has been taking steps to avoid listing the Greater Sage Grouse by reducing impacts where possible. Greater Sage Grouse habitat has been delineated to help BLM manage resources and reduce impacts. Because the proposed actions would not affect any designated Greater Sage Grouse habitat, the analyses conducted in the existing NEPA documents are still applicable.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Documentation of answer and explanation:
Yes, the analytical approach used in the existing NEPA documents continues to be appropriate for the current proposed action.

5. Is the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Documentation of answer and explanation:
Yes, public involvement and interagency review associated with existing NEPA documents are adequate. In addition, coordination regarding the planned Imlay Fire ESR actions has occurred between the Winnemucca District Range Management Specialist and the affected permittee in the form of a phone conversation on 09/03/2014.

E. Persons/Agencies/BLM Staff Consulted

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Wes Barry	Range Management Specialist	s/ Wes Barry 9/9/2014	Typo on first page
Rob Burton	Vegetation/Soils/Air Quality	s/ Rob Burton 9/9/2014	
Chris Powell	Cultural Resources	s/ Chris Powell 9/17/2014	CRINA submitted and completed
Pat Haynal	Cultural Resources (oversight)	s/ Pat Haynal 9/3/2014	CRINA needed Done 10/22/2014
John McCann	Hydrology/Riparian	s/ John McCann 9/18/2014	
Amanda DeForest	Wildlife	s/ Amanda DeForest 9/11/2014	
Greg Lynch	Fisheries	s/ Greg Lynch 9/3/2014	
Rob Bunkall	GIS	s/ Rob Bunkall 9/17/2014	
Eric Baxter	ESR Lead/Invasive Species/NAC	s/ Eric Baxter 10/22/2014	
Lynn Ricci	NEPA	s/ Lynn Ricci 10/22/2014	
Samantha Gooch	Wild Horse/Burro	s/ Samantha Gooch 9/3/2014	None
Zwaantje Rorex	Lands w/ Wilderness Characteristics/ WSA	s/ Zwaantje Rorex 9/11/2014	
Mark Williams	Fire/Fuels	s/ Mark Williams 9/15/2014	Comments in text Addressed MR
Pat Haynal	Paleontology	s/ Pat Haynal 9/3/2014	

Everett Bartz Range Everett Bartz 9/9/2014 none

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

[x] **Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM' compliance with the requirements of the NEPA.

Eric Baxter
Signature of Project Lead

Lynn Ricci
Signature of NEPA Coordinator

James W Schroeder 10/23/2014
Signature of the Responsible Official Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.